

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

**DEFENDANT SURES REGIS GROUP COMMERCIAL, INC.'S UPDATE TO THE
COURT REGARDING DOCUMENT PRODUCTION**

I. INTRODUCTION

Pursuant to the Court’s March 7, 2025 Order, Defendant Sares Regis Group Commercial, Inc. (“Sares Regis”) submits this Update to the Court to inform the Court of the status of its production of documents.

II. UPDATE

On March 26, 2025, Sares Regis filed its Amended Motion to Extend Document Production Deadline (Doc. No. 1108) to April 28, 2025, which the Court granted on March 27, 2025 (Doc. No. 1111).

Separately, given the volume of documents, Sares Regis and Plaintiffs have met and conferred and, on March 25, 2025, agreed that Sares Regis may utilize the TAR protocol employed by other defendants and already approved by Plaintiffs and the Court. (See, e.g., Doc Nos. 1024, 1049, 1059, 1063.) Sares Regis and Plaintiffs are jointly submitting for the Court’s approval the agreed-upon TAR Protocol, for Sares Regis.

Sares Regis believes that, given the volume of documents, such a process is necessary to complete in any sort of timely manner its document productions. Part of the parties' agreement that Sares Regis may use TAR was revised search terms, which Sares Regis has already run. The revised search terms yielded approximately four million documents. Sares Regis is now diligently working to produce the nonstructured data to meet the April 28, 2025 deadline, but it has not done so yet. Sares Regis has determined that through the use of TAR, it will be possible to complete production on or before April 28, 2025.

Dated: March 28, 2025

Respectfully Submitted:

By: /s/ Scott W. Perlin

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CERTIFICATE OF SERVICE

I hereby certify that on March 28, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record registered on the CM/ECF system.

/s/ Beau C. Creson

Beau C. Creson